

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

HANS MOKE NIEMANN,

Plaintiff,

vs.

SVEN MAGNUS ØEN CARLSEN A/K/A  
MAGNUS CARLSEN; PLAY MAGNUS AS,  
D/B/A PLAY MAGNUS GROUP;  
CHESS.COM, LLC; DANIEL RENSCH A/K/A  
“DANNY” RENSCH; AND HIKARU  
NAKAMURA,

Defendants.

Case No: 4:22-cv-01110-AGF

Hon. Audrey G. Fleissig

**STIPULATION AND [PROPOSED] ORDER  
REGARDING PENDING MOTIONS TO DISMISS**

**WHEREAS**, on December 2, 2022, Defendants Magnus Carlsen, Chess.com, LLC (“Chess.com”), and Daniel Rensch each filed Motions to Dismiss Plaintiff Hans Niemann’s Amended Complaint, ECF No. 20 (the “Amended Complaint”). *See* ECF Nos. 43 (Carlsen), 46 (Chess.com), 54 (Rensch);

**WHEREAS**, on December 7, 2022, Defendant Hikaru Nakamura filed a Motion to Dismiss Niemann’s Amended Complaint. *See* ECF No. 60;

**WHEREAS**, Plaintiff is presently considering filing a Second Amended Complaint in response to the Motions;

**WHEREAS**, Plaintiff has requested that Defendants agree to an extension of the deadlines for Plaintiff to attempt to file a Second Amended Complaint or oppose the Motions and, subject to the Court’s approval of Plaintiff’s requests, Defendants have agreed to such extensions as a professional courtesy;

**NOW, THEREFORE, IT IS HEREBY ORDERED THAT:**

1. Should Plaintiff elect to respond to the Motions by filing a Second Amended Complaint on the basis of his assertion that he is permitted to do so as a matter of course or by requesting the Court's leave, he shall do so on or before January 10, 2023.

2. Should Plaintiff elect to stand on his Amended Complaint, he shall file his opposition to the Motions on or before January 20, 2023. Any replies thereto shall be filed by Defendants on or before February 17, 2023.

3. Nothing contained herein is intended to, or shall be construed to, waive any of the parties' rights, or claims or defenses.

**IT IS SO ORDERED.**

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Hon. Audrey G. Fleissig